

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ENOVSYS LLC,

Plaintiff,

vs.

VERIZON COMMUNICATIONS, INC.,  
VERIZON BUSINESS NETWORK  
SERVICES, INC., VERIZON ENTERPRISE  
SOLUTIONS, LLC, CELLCO  
PARTNERSHIP D/B/A VERIZON  
WIRELESS, INC., VERIZON DATA  
SERVICES LLC, VERIZON BUSINESS  
GLOBAL, LLC, AND VERIZON  
SERVICES CORP.

Defendants.

CIVIL ACTION NO.: 2:21-cv-315

JURY TRIAL DEMANDED

**ENOVSYS LLC'S MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Enovsys LLC respectfully moves for entry of an Order authorizing Plaintiff to file under seal exhibits G and H in support of the Complaint, filed contemporaneously herewith. In support of this Motion, Plaintiff states as follows:

1. Public disclosure of the confidential exhibits will violate Plaintiff' and Defendants' established privacy interests because the exhibits embody private communications between Plaintiff and Defendants including proprietary and personal information of the Plaintiff. It is not anticipated that Defendant will oppose this motion, as they were recipients of the communications

2. Plaintiff will comply with all applicable local rules and procedures regarding filing under seal through the Court's CM/ECF system, including the requirement to file a redacted version within two days of filing the sealed documents.

WHEREFORE, Plaintiffs respectfully request entry of the attached order permitting the filing under seal of exhibits 7 and 8 to their Complaint.

Respectfully Submitted,

Dated: August 20, 2021

ZHEN LAW FIRM

By: /s/ Chris J. Zhen

Chris J. Zhen (CA BAR# 275575)

ZHEN LAW FIRM

5670 Wilshire Blvd #1800

Los Angeles, CA 90036

Telephone: (213) 935-0715

chris.zhen@zhenlawfirm.com

*Attorneys for Plaintiff Enovsys LLC*